UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MUSTAFA FTEJA, Plaintiff, -against- FACEBOOK, INC., Defendant.	Civil Action No. 1:11-cv-00918 (RJH)(MHD) SECOND DECLARATION OF JUSTIN NOLAN KINNEY IN SUPPORT OF FACEBOOK, INC.'S MOTION TO TRANSFER VENUE, MOTION TO DISMISS, AND MOTION FOR A MORE DEFINITE STATEMENT

I, Justin Nolan Kinney, declare:

1. I am an attorney at law of the State of New York and a member of the law firm of Coughlin Duffy LLP, attorneys for defendant Facebook, Inc. with responsibility for representation in this matter. In this capacity, I am fully familiar with the facts hereafter set forth.

2. Attached hereto as **Exhibit A** is a true and correct copy of *Facebook, Inc. v. Power Ventures, Inc.*, 2010 WL 3291750 (N.D. Cal. July 20, 2010).

3. Attached hereto as **Exhibit B** is a true and correct copy of *Chiste v. Hotels.com L.P.*, 2010 WL 4630317 (S.D.N.Y. Nov. 15, 2010).

4. Attached hereto as **Exhibit C** is a true and correct copy of *Bishop v. Henry Modell & Co.*, 2009 WL 3762119 (S.D.N.Y. Nov. 10, 2009).

5. Attached hereto as **Exhibit D** is a true and correct copy of *Young v. Facebook, Inc.*, No. 10-03579 (N.D. Cal. May 17, 2011).

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the U.S. Central Intelligence Agency's World Fact Book pertaining to Turkey. Those excerpts are available at https://www.cia.gov/library/publications/the-world-factbook/geos/tu.html.

7. Attached hereto as **Exhibit F** is a true and correct copy of *Schafer v. Hicksville Union Free School Dist.*, 2011 WL 1322903 (E.D.N.Y. Mar. 31, 2011).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 18th day of May, 2011 at New York, New York.

By: /s/ Justin Nolan Kinney
Justin Nolan Kinney (JK8531)